


**CLERK'S CERTIFICATE**

I, Zack Wallace, Circuit Clerk of the First Judicial District of Hinds County, Mississippi  
do certify that the following 18 pages is a true and correct copy of File #22-188, *Joe Ball,*  
*Jr. v. American Airlines, Inc., et al*

This the 20 day of April, 2022.

Zack Wallace, Clerk  
Hinds County Circuit Court, Mississippi

BY:   
DEPUTY CIRCUIT CLERK  




**IN THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT  
OF HINDS COUNTY, MISSISSIPPI**

**JOE BALL, JR.**

**PLAINTIFF**

**V.**

**CIVIL ACTION NO.**

22-188

**AMERICAN AIRLINES, INC., AND JOHN DOES 1-16**

**DEFENDANTS**

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**COMPLAINT  
(PLAINTIFF REQUESTS TRIAL BY JURY OF ALL DEFENDANTS NOT COVERED  
UNDER THE MISSISSIPPI TORT CLAIMS ACT)**

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COMES NOW, Joe Ball, Jr., by and through undersigned counsel and pursuant to the laws of the State of Mississippi and the Mississippi Rules of Civil Procedure, and files this Complaint against the Defendants, American Airlines, Inc.(American Airlines), and John Does 1-16 (hereinafter collectively referenced as "Defendants"). In support thereof, Plaintiff would respectfully show unto this Honorable Court the following, to-wit:

**I.**

**PARTIES**

1. Plaintiff, Joe Ball, Jr., is an adult resident citizen of Lauderdale County, Mississippi, with a residence address of 2915 St. Luke Street, Meridian, Mississippi 39301.

2. Defendant, American Airlines, Inc., is a corporation organized and existing under the laws of the state of Mississippi, and is authorized to do business in Mississippi with its principle place of business at 1 Skyview Drive, Fort Worth, Texas. Pursuant to Rule 4(d)(8), Defendant, American Airlines, may be served through its registered agent, Corporation Service Company, at 7716 Old Canton Road, Suite C, Madison, Mississippi 39110.

3. John Does 1-16 are other currently unknown individuals, persons, corporate persons or entities who may be liable for all or part of the negligible acts or omissions committed

resulting in the subject incidents which involved and resulted in the injuries sustained by Plaintiff, and in whom Plaintiff may seek recovery of damages.

## **II.**

### **JURISDICTION AND VENUE**

4. This Court has subject matter jurisdiction over this matter pursuant to Mississippi Code Annotated § 9-9-21 (2007) and any and all other applicable statutes or Mississippi Constitutional provisions that vest authority and jurisdiction in county courts.

5. This Court has personal jurisdiction over the Defendants pursuant to all applicable Mississippi statutory and case law.

6. Venue is properly established before this Court based upon Mississippi Code Annotated § 11-11-3 (1)(a)(i) (Amended 2006). Pursuant to the statute, venue is proper because the present action has been instituted, because the acts and omissions complained of occurred here in Jackson, Mississippi. This Court has personal jurisdiction over the Defendants pursuant to all applicable Mississippi statutory and case law. This Court has personal jurisdiction over all the Defendants in the instant suit who reside or may be found in the State of Mississippi, or who have qualified to do business in the State of Mississippi under the Mississippi Long Arm Statute, Section 13-3-57 and have appointed a registered agent to accept service of process. Any and all foreign Defendants are subject to jurisdiction of said, Mississippi Long Arm Statute.

## **III.**

### **FACTS**

9. On or about February 28, 2022, Plaintiff Joe Ball, Jr. returned from a flight to the Jackson-Medgar Wiley Evers Airport which is located in Jackson, Hinds County, Mississippi.

10. On that day, Plaintiff was being assisted by employees/contractors of American Airlines when suddenly, said workers dropped the Plaintiff, from his wheel chair, causing injuries to his head and hip.

11. At all relevant times, Plaintiff, 84, entrusted his care to American Airlines service workers who were responsible at placing him in the appropriate chair for his safety.

12. On information and belief, the entire family of Plaintiff was aware and witnessed the incident. It was reported by the Supervisor and the family of the Plaintiff in which an incident report was to be done and completed.

13. At all relevant times, American Airlines and its employees/contractors owed a heightened duty to Plaintiff to protect and care for him at all costs when baring the responsibility to assist passengers even those with disabilities.

14. Due to the nature of the incident, Pafford Ambulance Services was contacted but was unable to transport the Plaintiff; thus, causing the Plaintiff's family to transport him to a medical facility in Meridian, Mississippi.

15. Plaintiff is currently undergoing more medical treatment including therapy in an attempt to recover from the incident.

16. Upon information and belief, the employees of American Airlines and John Does 1 - 16 possessed a duty to protect and care for its passengers. American Airlines and John Does 1 - 16 knew or should have known that whenever a passenger needs assisting, the proper number of staff must be present and protocols/procedures for assisting passengers must be followed. At all relevant times Defendant, John Does 1 – 16, were the managers, supervisors, and employees of American Airlines at Jackson – Medgar Wiley Evers International Airport, Jackson, Mississippi on duty at the time of the incident. As managers, supervisors, and employees of

American Airlines, it was John Doe Defendants 1 – 16’s duty to make the premises reasonably safe, to inspect the premises for dangerous conditions and to know what work is being conducted at all times. John Doe Defendants 1 – 10, in their roles as managers, supervisors, and employees of American Airlines, failed to do what a reasonable, prudent managers, supervisors, and employees of American Airlines would have done in the same or similar circumstances. The actions and/or inactions of this Defendant proximately caused the Plaintiff’s injuries and damages.

17. As a result of the collective actions and inactions of all Defendants, Plaintiff has suffered severe physical injury, permanent injury, severe pain, scarring, emotional and psychological trauma, manifesting itself in forms of physical injury.

18. The actions of the Defendants herein were the actual and proximate cause of the injuries sustained by the Plaintiff.

#### **IV.**

#### **CLAIMS FOR RELIEF**

#### **COUNT I- NEGLIGENCE**

19. Plaintiff re-alleges and incorporates herein the foregoing allegations of this Complaint as if set forth herein in their entirety.

20. Defendants owed a duty to the Plaintiff to exercise reasonable care to protect passengers from reasonably foreseeable harm and injuries. At the time and on the occasion in question, Defendants possessed a duty of reasonable/ordinary care (i) to make sure the passengers are safe and (ii) to follow all appropriate safety measures when assisting the passengers. Defendants breached their duties and were negligent in failing to do what a reasonable, prudent establishment would have done under these circumstances.

21. Further, the Defendants' act(s) and/or omission(s) proximately caused the Plaintiff's injuries.

22. As a result of the act(s) and/or omission(s) of the Defendants, Plaintiff sustained injuries, losses and damages.

### **COUNT II - GROSS NEGLIGENCE**

23. Plaintiff re-alleges and incorporates herein the foregoing allegations of this Complaint as if set forth herein in their entirety.

24. When viewed objectively, the Defendants' act(s) and/or omission(s) involved an extreme degree of risk and constituted willful, wanton and reckless conduct under these circumstances. To this end, Defendants' act(s) and/or omission(s) constitute gross negligence under Mississippi law.

25. The act(s) and/or omission(s) of the Defendants constitute gross negligence and were each a proximate cause of the occurrence in question. Further, the act(s) and/or omission(s) of the Defendants resulted in the Plaintiff's losses and damages.

26. As a result of the act(s) and/or omission(s) of the Defendants, M.Y. sustained injuries, losses and damages.

### **COUNT III- PREMISES LIABILITY**

27. Plaintiff re-alleges and incorporates herein the foregoing allegations of this Complaint as if set forth herein in their entirety.

28. At all relevant times, Plaintiff was an American Airlines passenger and a citizen of Meridian, Lauderdale County, Mississippi.

29. The duties the Defendants owed were to provide reasonable/ordinary care (i) to make sure the passengers is safe and (ii) to follow all appropriate safety measures when assisting the passengers.

30. By a preponderance of the evidence, it will be established that the Defendant had actual and/or constructive knowledge of how to care for the Plaintiff.

31. These Defendants had actual and/or constructive knowledge that there was an open manhole in the field, but failed to make the premises reasonably safe.

32. The act(s) and/or omission(s) of the Defendants proximately caused the occurrence of the incident in question.

33. As a result of the act(s) and/or omission(s) of the Defendants, Plaintiff sustained injuries, losses, and damages.

**COUNT IV- RES IPSA LOQUITUR**

34. Plaintiff re-alleges and incorporates herein the foregoing allegations of this Complaint as if set forth herein in their entirety.

35. At all pertinent times, Defendants were in sole and complete control in this instance of dropping passenger from his wheel chair, in which the instrumentality causing the resulting serious injuries to the Plaintiff occurred.

36. Defendants failed to exercise the power necessary to avert the resulting incident by failing to (i) to make sure the passengers are safe and (ii) to follow all appropriate safety measures when assisting the passengers.

37. Defendants were presented with an available opportunity to prevent the subject incident. Defendants, however, chose not to exercise such control and thereby caused the resulting injuries to the Plaintiff.

38. Defendants' conduct was willful, wanton, grossly negligent, insensitive and exhibited reckless disregard for the rights of the Plaintiff.

39. The act(s) and/or omission(s) of these Defendants proximately caused the injuries and damages sustained by Plaintiff.

**COUNT V- DAMAGES**

40. Plaintiff re-alleges and incorporates herein the foregoing allegations of this Complaint as if set forth herein in their entirety.

41. As a result of the act(s) and/or omission(s) of the Defendants, Plaintiff seeks the recovery of any and all kinds of general, compensatory, economic, expectation, statutory, incidental, consequential, past medical bills, current medical bills, future medical bills, loss of wages, and any other type of damages incurred as a result of this incident, including but not limited to the court's jurisdiction in actual damages, plus cost, interests, attorneys' fees and expenses, expectation, statutory, incidental, consequential and other kinds of damages.

**PUNITIVE / EXEMPLARY DAMAGES**

42. Plaintiff re-alleges and incorporates herein the foregoing allegations of this Complaint as if set forth herein in their entirety.

43. Pursuant to Miss. Code Ann. § 11-1-65, inasmuch as the conduct of the Defendants constitutes willful, wanton, egregious and reckless conduct, an award of punitive damages is appropriate and necessary under these facts.

**RIGHT TO AMEND PURSUANT TO MISS. R. CIV. P. 15**

44. Pursuant to Rule 15 of the Mississippi Rules of Civil Procedure, Plaintiff reserves the right to name additional defendants should later facts establish that others are liable herein.

**JURY TRIAL DEMANDED**



45. Plaintiff demands a jury trial, as to any and all Defendants not covered under the Mississippi Tort Claims Act.

46. Plaintiff seeks an award in this action commensurate with the full extent of her injuries and damages.

**WHEREFORE, PREMISES CONSIDERED,** Plaintiff prays that upon final trial and judgment hereof they be entitled to take, have and recover, of and from said Defendants the above damages, including actual, economic, non-economic, compensatory, exemplary, punitive, pre-judgment interest, post-judgment interest, costs of Court, attorney's fees, and for such other and further relief to which they are justly entitled. Plaintiff prays that the Defendants be cited to appear and answer and that upon final hearing, Plaintiff has judgment of and from the Defendants, jointly and severally, for:

- (1) Past physical pain, permanent injury, disfigurement, and mental suffering;
- (2) Future physical pain, disfigurement, and mental suffering;
- (3) Past and future mental anguish;
- (4) Past necessary medical expenses;
- (5) Future necessary medical and other expenses that, in reasonable probability, will be sustained;
- (6) Past and future physical impairment;
- (7) Past and future loss of enjoyment and quality of life;
- (8) Actual, incidental and consequential damages;
- (9) Punitive and exemplary damages in an amount above the minimum jurisdictional limits of the court;
- (10) Pre-judgment interest at the maximum legal rate for all damages suffered;

- (11) Post-judgment interest at the maximum legal rate for all damage suffered;
- (12) Reasonable attorneys' fees and costs of court, and
- (13) For such other and further relief, at law or in equity, to which Plaintiff is justly entitled.

Dated this the 31<sup>st</sup> day of March, 2022.

**JOE BALL JR., Plaintiff**

By:

  
Deshun T. Martin, Esq.

**OF COUNSEL:**

DESHUN T. MARTIN, ESQ. (MSB #: 101526)  
VATERRIA M. MARTIN, ESQ. (MSB #: 101235)  
MARTIN and MARTIN, PA  
Attorneys & Counselors  
228 East Capitol Street  
Jackson, Mississippi 39201  
Telephone: (601) 355-0955  
Facsimile: (601) 355-0957  
E-Mail: [DTMartin@4MartinsAtLaw.com](mailto:DTMartin@4MartinsAtLaw.com)  
E-Mail: [VMMartin@4MartinsAtLaw.com](mailto:VMMartin@4MartinsAtLaw.com)

<b>COVER SHEET</b> <b>Civil Case Filing Form</b> (To be completed by Attorney/Party Prior to Filing of Pleading)		Court Identification Docket # <div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; padding: 2px;">05</div> <div style="border: 1px solid black; padding: 2px;">1</div> <div style="border: 1px solid black; padding: 2px;">C1</div> </div> <div style="display: flex; justify-content: space-around; font-size: small;"> <span>County #</span> <span>Judicial District</span> <span>Court ID (CH, CI, CO)</span> </div> <div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; padding: 2px;">02</div> <div style="border: 1px solid black; padding: 2px;">2</div> <div style="border: 1px solid black; padding: 2px;">123</div> </div> <div style="display: flex; justify-content: space-around; font-size: small;"> <span>Month</span> <span>Date</span> <span>Year</span> </div>		Case Year <div style="border: 1px solid black; padding: 2px; display: inline-block;">2022</div>		Docket Number <div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; padding: 2px;">1</div> <div style="border: 1px solid black; padding: 2px;">88</div> </div> <div style="border: 1px solid black; padding: 2px; margin-top: 5px; text-align: center;">Local Docket ID</div>	
Mississippi Supreme Court Administrative Office of Courts		Form AOC/01 (Rev 2016)		Case Number if filed prior to 1/1/94			
In the COUNTY <u>Cit.</u>		Court of <u>HINDS</u>		County <u>FIRST</u> Judicial District			
Origin of Suit (Place an "X" in one box only)							
<div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;"><input checked="" type="checkbox"/> Initial Filing</div> <div style="width: 50%;"><input type="checkbox"/> Reinstated</div> <div style="width: 50%;"><input type="checkbox"/> Foreign Judgment Enrolled</div> <div style="width: 50%;"><input type="checkbox"/> Transfer from Other court</div> <div style="width: 50%;"><input type="checkbox"/> Remanded</div> <div style="width: 50%;"><input type="checkbox"/> Reopened</div> <div style="width: 50%;"><input type="checkbox"/> Joining Suit/Action</div> <div style="width: 50%;"><input type="checkbox"/> Appeal</div> <div style="width: 50%;"><input type="checkbox"/> Other</div> </div>							
<b>Plaintiff - Party Initially Bringing Suit Should Be Entered First - Enter Additional Plaintiffs on Separate Form</b>							
Individual <u>Ball</u> Last Name <u>Joe</u> First Name _____ Maiden Name, if applicable _____ M.I. _____ Jr _____ Check ( x ) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: _____ Estate of _____ Check ( x ) if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: _____ D/B/A or Agency _____							
Business _____ Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated _____ Check ( x ) if Business Plaintiff is filing suit in the name of an entity other than the above, and enter below: _____ D/B/A _____							
Address of Plaintiff <u>2915 Saint Luke Street, Meridian, Mississippi 39301</u>							
Attorney (Name & Address) <u>Deshun T. Martin, 228 E. Capitol Street, Jackson, Mississippi 39201</u> MS Bar No. <u>101526</u> Check ( x ) if Individual Filing Initial Pleading is NOT an attorney Signature of Individual Filing: _____							
<b>Defendant - Name of Defendant - Enter Additional Defendants on Separate Form</b>							
Individual _____ Last Name _____ First Name _____ Maiden Name, if applicable _____ M.I. _____ Jr/Sr/III/IV _____ Check ( x ) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: _____ Estate of _____ Check ( x ) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: _____ D/B/A or Agency _____							
Business <u>American Airlines</u> Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated _____ Check ( x ) if Business Defendant is acting in the name of an entity other than the above, and enter below: _____ D/B/A _____							
Attorney (Name & Address) - If Known _____ MS Bar No. _____							
Check ( x ) if child support is contemplated as an issue in this suit.* *If checked, please submit completed Child Support Information Sheet with this Cover Sheet							
<b>Nature of Suit (Place an "X" in one box only)</b>							
<b>Domestic Relations</b> <input type="checkbox"/> Child Custody/Visitation <input type="checkbox"/> Child Support <input type="checkbox"/> Contempt <input type="checkbox"/> Divorce: Fault <input type="checkbox"/> Divorce: Irreconcilable Diff. <input type="checkbox"/> Domestic Abuse <input type="checkbox"/> Emancipation <input type="checkbox"/> Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Property Division <input type="checkbox"/> Separate Maintenance <input type="checkbox"/> Term. of Parental Rights-Chancery <input type="checkbox"/> UIFSA (eff 7/1/97; formerly URESA) <input type="checkbox"/> Other _____		<b>Business/Commercial</b> <input type="checkbox"/> Accounting (Business) <input type="checkbox"/> Business Dissolution <input type="checkbox"/> Debt Collection <input type="checkbox"/> Employment <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Replevin <input type="checkbox"/> Other _____		<b>Probate</b> <input type="checkbox"/> Accounting (Probate) <input type="checkbox"/> Birth Certificate Correction <input type="checkbox"/> Mental Health Commitment <input type="checkbox"/> Conservatorship <input type="checkbox"/> Guardianship <input type="checkbox"/> Heirship <input type="checkbox"/> Intestate Estate <input type="checkbox"/> Minor's Settlement <input type="checkbox"/> Muniment of Title <input type="checkbox"/> Name Change <input type="checkbox"/> Testate Estate <input type="checkbox"/> Will Contest <input type="checkbox"/> Alcohol/Drug Commitment (Involuntary)			
<b>Appeals</b> <input type="checkbox"/> Administrative Agency <input type="checkbox"/> County Court <input type="checkbox"/> Hardship Petition (Driver License) <input type="checkbox"/> Justice Court <input type="checkbox"/> MS Dept Employment Security <input type="checkbox"/> Municipal Court <input type="checkbox"/> Other _____		<b>Child Rights</b> <input type="checkbox"/> Elections <input type="checkbox"/> Expungement <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Post Conviction Relief/Prisoner <input type="checkbox"/> Other _____		<b>Contract</b> <input type="checkbox"/> Breach of Contract <input type="checkbox"/> Installment Contract <input type="checkbox"/> Insurance <input type="checkbox"/> Specific Performance <input type="checkbox"/> Other _____			
<b>Statutes/Rules</b> <input type="checkbox"/> Bond Validation <input type="checkbox"/> Civil Forfeiture <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Injunction or Restraining Order <input type="checkbox"/> Other _____		<b>Real Property</b> <input type="checkbox"/> Adverse Possession <input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain <input type="checkbox"/> Eviction <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Lien Assertion <input type="checkbox"/> Partition <input type="checkbox"/> Tax Sale: Confirm/Cancel <input type="checkbox"/> Title Boundary or Easement <input type="checkbox"/> Other _____		<b>Torts</b> <input type="checkbox"/> Bad Faith <input type="checkbox"/> Fraud <input type="checkbox"/> Intentional Tort <input type="checkbox"/> Loss of Consortium <input type="checkbox"/> Malpractice - Legal <input type="checkbox"/> Malpractice - Medical <input type="checkbox"/> Mass Tort <input checked="" type="checkbox"/> Negligence - General <input type="checkbox"/> Negligence - Motor Vehicle <input type="checkbox"/> Product Liability <input type="checkbox"/> Subrogation <input type="checkbox"/> Wrongful Death <input type="checkbox"/> Other _____			

**IN THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT OF  
HINDS COUNTY, MISSISSIPPI**

**JOE BALL, JR.**

**PLAINTIFF**

**V.**

**CIVIL ACTION NO. 22-188**

**AMERICAN AIRLINES, INC., AND JOHN DOES 1-16**

**DEFENDANTS**

**SUMMONS**

**THE STATE OF MISSISSIPPI**

**TO: AMERICAN AIRLINES, INC.  
CORPORATION SERVICE COMPANY  
7716 Old Canton Road, Suite C  
Madison, Mississippi 39110  
Or Wherever The Individual May Be Found.**

**NOTICE TO DEFENDANT:**

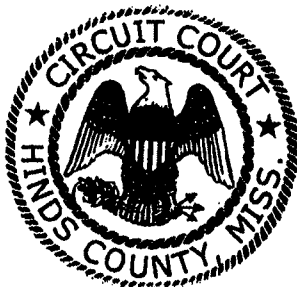
**THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.**

You are required to mail or hand-deliver a copy of a written response to the Complaint to Deshun T. Martin or Vatterria M. Martin; Martin and Martin, PA, Attorneys & Counselors, the attorneys for the Plaintiff, whose address is 228 East Capitol Street, Jackson, Mississippi 39201. Your response must be mailed or delivered within thirty (30) days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or things demanded in the Complaint.

You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and seal of said Court, this 31<sup>st</sup> day of March, 2022.

**ZACK WALLACE, CIRCUIT CLERK**  
Hinds County Circuit Court Clerk  
Jackson, Hinds County, Mississippi



BY: [Signature]

**IN THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT  
OF HINDS COUNTY, MISSISSIPPI**

**JOE BALL, JR.**

**PLAINTIFF**

**V.**

**CIVIL ACTION NO. \_\_\_\_\_**

**AMERICAN AIRLINES, INC., AND JOHN DOES 1-16**

**DEFENDANTS**

**PROOF OF SERVICE-SUMMONS**

\_\_\_\_\_  
Name of Person or Entity Served

I, the undersigned process server, served the summons and complaint upon the person or entity named above in the manner set forth below:

\_\_\_\_\_**FIRST CLASS MAIL AND ACKNOWLEDGMENT OF SERVICE.** By mailing (by first class mail, postage prepaid), on the date stated in the attached Notice, copies to the person served, together with copies of the form of notice and acknowledgment and return envelope, postage prepaid, addressed to the sender.

\_\_\_\_\_**PERSONAL SERVICE.** I personally delivered copies to \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, where I found said person(s) in \_\_\_\_\_ county of the State of \_\_\_\_\_.

\_\_\_\_\_**RESIDENCE SERVICE.** After exercising reasonable diligence I was unable to deliver copies to said person within Mississippi. I served the summons and complaint on the\_\_\_\_ day of \_\_\_\_\_, at the usual place of abode of said person by leaving a true copy of the summons and complaint with\_\_\_\_\_, who is the\_\_\_\_\_, a member of the family served above the age of sixteen years and willing to receive the summons and complaint, and thereafter on the\_\_\_\_\_ day of \_\_\_\_\_, 2022, I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

\_\_\_\_\_**CERTIFIED MAIL SERVICE.** By mailing to an address outside Mississippi (by first class mail, postage prepaid, requiring a return receipt) copies to the person served.

At the time of service I was at least 18 years of age and not a party to this action. Fee for service: \$ \_\_\_\_\_.

Process server must list below: (Please print or type)

Name: \_\_\_\_\_

Drivers License Number: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_  
Telephone Number: \_\_\_\_\_

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State of \_\_\_\_\_  
County of \_\_\_\_\_

Personally appeared before me the undersigned authority in and for the state and county aforesaid, the within named \_\_\_\_\_ who being first duly sworn states on oath that the matters and facts set forth in the foregoing "Proof of Service-Summons" are true and correct as therein stated.

\_\_\_\_\_  
Process Server (Signature)

Sworn to and subscribed before me this the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
Notary Public

My Commission Expires:

\_\_\_\_\_

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Case: 25CI1:22-cv-00188-WLK Document #: 3 Filed: 03/31/2022 Page 2 of 3

IN THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT  
OF HINDS COUNTY, MISSISSIPPI

JOE BALL, JR.

PLAINTIFF

V.

CIVIL ACTION NO. 25CI1:22-CV-00188 W/LK

AMERICAN AIRLINES, INC., AND JOHN DOES 1-16

DEFENDANTS

PROOF OF SERVICE-SUMMONS

American Airlines

Name of Person or Entity Served

I, the undersigned process server, served the summons and complaint upon the person or entity named above in the manner set forth below:

       FIRST CLASS MAIL AND ACKNOWLEDGMENT OF SERVICE. By mailing (by first class mail, postage prepaid), on the date stated in the attached Notice, copies to the person served, together with copies of the form of notice and acknowledgment and return envelope, postage prepaid, addressed to the sender.

1<sup>st</sup>        PERSONAL SERVICE. I personally delivered copies to Robbie Key on the 1<sup>st</sup> day of April, 20 22, where I found said person(s) in MADISON county of the State of MS.

       RESIDENCE SERVICE. After exercising reasonable diligence I was unable to deliver copies to said person within Mississippi. I served the summons and complaint on the        day of       , at the usual place of abode of said person by leaving a true copy of the summons and complaint with       , who is the       , a member of the family served above the age of sixteen years and willing to receive the summons and complaint, and thereafter on the        day of       , 2022, I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

       CERTIFIED MAIL SERVICE. By mailing to an address outside Mississippi (by first class mail, postage prepaid, requiring a return receipt) copies to the person served.

At the time of service I was at least 18 years of age and not a party to this action. Fee for service: \$       .

Process server must list below: (Please print or type)

Name: Carolyn J. Brown

Drivers License Number: XVX-KX-6172

Address: 228 E. Capitol St.

Jackson, MS

39201

Telephone Number: 601 351-0955

Case: 25CI1:22-cv-00188-WLK Document #: 4 Filed: 04/06/2022 Page 2 of 2

Case: 25CI1:22-cv-00188-WLK Document #: 3 Filed: 03/31/2022 Page 3 of 3

State of Mississippi  
County of Hinds

Personally appeared before me the undersigned authority in and for the state and county aforesaid, the within named Carolyn J. Brown who being first duly sworn states on oath that the matters and facts set forth in the foregoing "Proof of Service-Summons" are true and correct as therein stated.

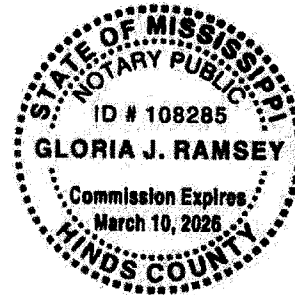
Carolyn J. Brown  
Process Server (Signature)

Sworn to and subscribed before me this the 1st day of April, 2022

Gloria J. Ramsey  
Notary Public

My Commission Expires:

03/10/2022





IN THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT OF  
HINDS COUNTY, MISSISSIPPI

JOE BALL, JR.

PLAINTIFF

V.

CIVIL ACTION NO. 22-188

AMERICAN AIRLINES, INC., AND JOHN DOES 1-16

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SUMMONS

THE STATE OF MISSISSIPPI

TO: AMERICAN AIRLINES, INC.  
CORPORATION SERVICE COMPANY  
7716 Old Canton Road, Suite C  
Madison, Mississippi 39110  
Or Wherever The Individual May Be Found.

NOTICE TO DEFENDANT:

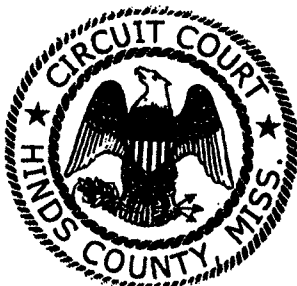
THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

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You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and seal of said Court, this 31<sup>st</sup> day of March, 2022.

ZACK WALLACE, CIRCUIT CLERK  
Hinds County Circuit Court Clerk  
Jackson, Hinds County, Mississippi



BY: [Signature]

**IN THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT  
OF HINDS COUNTY, MISSISSIPPI**

**JOE BALL, JR.**

**PLAINTIFF**

**V.**

**CIVIL ACTION NO. \_\_\_\_\_**

**AMERICAN AIRLINES, INC., AND JOHN DOES 1-16**

**DEFENDANTS**

**PROOF OF SERVICE-SUMMONS**

\_\_\_\_\_  
Name of Person or Entity Served

I, the undersigned process server, served the summons and complaint upon the person or entity named above in the manner set forth below:

\_\_\_\_\_**FIRST CLASS MAIL AND ACKNOWLEDGMENT OF SERVICE.** By mailing (by first class mail, postage prepaid), on the date stated in the attached Notice, copies to the person served, together with copies of the form of notice and acknowledgment and return envelope, postage prepaid, addressed to the sender.

\_\_\_\_\_**PERSONAL SERVICE.** I personally delivered copies to \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, where I found said person(s) in \_\_\_\_\_ county of the State of \_\_\_\_\_.

\_\_\_\_\_**RESIDENCE SERVICE.** After exercising reasonable diligence I was unable to deliver copies to said person within Mississippi. I served the summons and complaint on the \_\_\_\_\_ day of \_\_\_\_\_, at the usual place of abode of said person by leaving a true copy of the summons and complaint with \_\_\_\_\_, who is the \_\_\_\_\_, a member of the family served above the age of sixteen years and willing to receive the summons and complaint, and thereafter on the \_\_\_\_\_ day of \_\_\_\_\_, 2022, I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

\_\_\_\_\_**CERTIFIED MAIL SERVICE.** By mailing to an address outside Mississippi (by first class mail, postage prepaid, requiring a return receipt) copies to the person served.

At the time of service I was at least 18 years of age and not a party to this action. Fee for service: \$ \_\_\_\_\_.

Process server must list below: (Please print or type)

Name: \_\_\_\_\_

Drivers License Number: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

State of \_\_\_\_\_  
County of \_\_\_\_\_

Personally appeared before me the undersigned authority in and for the state and county aforesaid, the within named \_\_\_\_\_ who being first duly sworn states on oath that the matters and facts set forth in the foregoing "Proof of Service-Summons" are true and correct as therein stated.

\_\_\_\_\_  
Process Server (Signature)

Sworn to and subscribed before me this the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
Notary Public

My Commission Expires:

\_\_\_\_\_